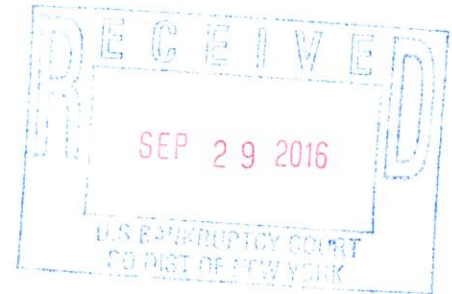


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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
In re	:	Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	
Debtors	:	08-13555 (SCC)
:	:	(Jointly Administered)
-----X		

**Response to Motion to Disallow and Expunge (Doc. 53260) Filed 08/30/16:
Motion to Allow Administrative Claim Instantly Or Partial Transfer and Amendment of
Existing Claim 15989, Loan File Number 45268737 (or entry effecting the same result)**

Now comes Danielle Pauer Gordon, Surviving Spouse of Jon S. Gordon, appearing pro se and moves this Court to Consider her Motion to file a Claim, or Proof of claim Instantly.

The Grounds for this Motion are the Fifth and Fourteenth Amendments. Due Process and the Right to notice and the opportunity to file an objection in the Court where private property rights are being forfeited or possibly lost over a debt or a lien. The debt was properly under the jurisdiction of this court, but movant was never informed of the fact.

Movant's late husband was an individual borrower whose loan originated in 2007. It was accelerated in 2008, and a foreclosure was filed. In 2009, Mr. Gordon passed away without answering, and the case was dismissed in 2010. In 2009 Movant filed a complaint for rescission with the Ohio Attorney General. In 2010, Movant filed an action for rescission in Cuyahoga County Court of Common Pleas, which was voluntarily dismissed, with notice of right to refile.

The foreclosure was refiled in 2012. The foreclosure was granted by default judgment against Mrs. Gordon, who was denied review by the Ohio Supreme Court, in September of 2016.

Mrs. Gordon, the Movant, appealed on the grounds of insufficiency of process, fraud, and unauthorized signature, among others. During the time the appeal was pending, Movant discovered that the loan, which was not assigned into any trust, was actually listed within the SASCO LXS 2007 8H Trust. On August 30, 2016, Movant recognized the loan number of her mortgage loan in an exhibit, Doc. 53261, to a motion, Doc. 53260. Movant now asks the Court to transfer the loan file, which is scheduled for a hearing to be disallowed and expunged, to her and to amend it to include damages. It has been valued at \$0.0.

A Brief in support of the motion is attached, with exhibits.

Date: September 26, 2016
Respectfully Submitted By:

s/Danielle Gordon
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Certificate of Service:

On September 26, 2016, I sent a copy of this motion to the following by hand delivered:

(a) the chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York 10004, Courtroom 23;

And by United States Mail, Postage Prepaid:

(b) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: William K. Harrington, Esq., Susan D. Golden, Esq., and Andrea B. Schwartz., Esq.);

(c) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Esq., Wilbur F. Foster, Jr., Esq., Dennis C. O'Donnell, Esq., and Evan R. Fleck, Esq.), attorneys for the official committee of unsecured creditors;

(d) Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019 (Attn: Paul V. Shalhoub, Esq., Todd G. Cosenza, Esq., and Benjamin P. McCallen, Esq.), attorneys for LBHI and certain of its affiliates; and

(e) Rollin Braswell Fisher LLC, 8350 East Crescent Parkway, Suite 100, Greenwood Village, Colorado 80111 (Attn: Michael A. Rollin, Esq. and Maritza Dominguez Braswell, Esq.)

By:

/s/ Danielle Gordon

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